

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

Trans-Radial Solutions, LLC,

Plaintiff,

v.

Burlington Medical, LLC *et al.*,

Defendants.

Civil Action No. 2:18-cv-00656

PLAINTIFF'S MOTION TO COMPEL

Plaintiff Trans-Radial Solutions, LLC, by counsel, pursuant to Federal Rules of Civil Procedure 33, 34, 36, and 37 and Local Rule 26(C), moves this Court for entry of an Order deeming all objections waived, deeming requested matters admitted, and compelling discovery responses from defendants Burlington Medical, LLC and Phillips Safety Products, Inc., both of whom have failed to serve objections, answer any interrogatories, or respond to any document requests or requests for admission, despite proper service and good-faith efforts by TRS to resolve this matter without court action. The grounds for the motion, and the specific relief sought, are set forth more fully in the accompanying memorandum in support.

Dated: July 3, 2019

TRANS-RADIAL SOLUTIONS, LLC

By: /s/ W. Ryan Snow

Of Counsel

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Counsel for Plaintiff

CERTIFICATE OF GOOD FAITH

In accordance with Federal Rule of Civil Procedure 37 and Local Rule 37(E), I hereby certify that a good faith effort has been made between counsel for Trans-Radial Solutions, LLC and counsel for Burlington Medical, LLC and Phillips Safety Products, Inc. to resolve the discovery matters at issue. Counsel met and conferred through multiple electronic correspondence and by telephone.

/s/ W. Ryan Snow

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July 2019, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Eastern District of Virginia, Norfolk Division, using the electronic case filing system of the court. The electronic case filing system will send a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ W. Ryan Snow

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